

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

IN RE:

Pro-Mark Services, Inc.,

Debtor.

Case No. 24-30167

Chapter 7

Chief Judge Shon Hastings

Erik A. Ahlgren, Trustee,

Plaintiff,

-v-

Adv. Case No. 24-07014

Connie Berg, et al.,

Defendants.

**STIPULATED MOTION TO EXTEND MIGUEL PAREDES' TIME TO RESPOND TO
PLAINTIFF'S AMENDED COMPLAINT**

1. Plaintiff, Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, filed his Second Amended Complaint against the Defendants, including Defendant Miguel Paredes, on May 20, 2025. (Doc. 120.)

2. Defendant Paredes' deadline to file an answer or other response to the Second Amended Complaint is August 1, 2025. (Doc. 144.)

3. Plaintiff and Defendant Paredes continue to engage in good-faith settlement discussions. To facilitate those settlement discussions, Plaintiff and Defendant Paredes hereby move the Court, by stipulation, for an order further extending the deadline for Defendant Paredes to file an answer or other response to the Second Amended Complaint to August 15, 2025.

Dated: *August 1, 2025*

/s/ Peter D. Kieselbach

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Dated: *August 1, 2025*

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